BEYS LISTON & MOBARGHA LLP Nader Mobargha Michael P. Beys 641 Lexington Avenue New York, NY 10022 Tel: (646) 755-3603

Fax: (646) 755-3599 nmobargha@blmllp.com mbeys@blmllp.com

Counsel for Secured Creditor Azadeh Nasser Azari

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK	
In re: WANSDOWN PROPERTIES CORPORATION, N.V.,	X : : Chapter 11 : : Case No. 19-13223 (SMB) :
Debtor	: : : : : : : : : : : : :

SECURED CREDITOR AZADEH NASSER AZARI'S JOINDER IN DEBTOR'S APRIL 22, 2020 OBJECTION TO CLAIM NO. 9 BY PELMADULLA STIFTUNG

Azadeh Nasser Azari ("Ms. Azari"), a secured creditor of the Debtor Wansdown Properties Corporation, N.V. (the "Debtor"), through undersigned counsel, respectfully joins the Debtor's April 22, 2020 objection seeking entry of an order disallowing and expunging the claim of Pelmadulla Stiftung ("Pelmadulla"), designated as claim number 9 on the Debtor's claim register (the "Claim Objection"). (See ECF No. 89)

- 1. Ms. Azari is a secured creditor of the Debtor and, on December 12, 2019, filed a proof of claim in this bankruptcy. (See Claim No. 6)
- 2. The Debtor has filed an adversary proceeding on behalf of creditors in this bankruptcy challenging Ms. Azari's secured claim as an allegedly fraudulent transfer under Section 544(b) of the Bankruptcy Code. (*See Wansdown v. Azari*, Adv. Pro. No. 19-1450).
- 3. On December 31, 2019, Pelmadulla, the sole shareholder of the Debtor, filed an alleged unsecured claim in the amount of \$3,243,941.19. (See Claim No. 9).
- 4. Ms. Azari objects to unsubstantiated claims filed by creditors in this bankruptcy, such as the one filed by Pelmadulla.
- 5. On January 21, 2020, undersigned counsel wrote to counsel for Pelmadulla, Sanford P. Rosen, Esq. of Rosen, P.C., and requested additional documents that would support Pelmadulla's claim, "including, but not limited to, any loan documents, promissory notes, or correspondence reflecting any loan agreement between the Debtor and Pelmadulla," which was the basis of Pelmadulla's claim.
- 6. On January 24, 2020, Mr. Rosen responded that his firm has "followed up with [Pelmadulla] and will amend their claim accordingly."
 - 7. To date, Pelmadulla has not amended it claim.
- 8. As such, Ms. Azari joins the Debtor's Claim Objection, adopting all of the arguments in the Debtor's April 22, 2020 filing.

Dated: May 14, 2020 New York, New York

	I & MORARGHA LLP	MORA	R	\mathbf{ON}	T	15	T	ZS	$\mathbf{F}_{\mathbf{A}}$	R
--	------------------	------	---	---------------	---	----	---	----	---------------------------	---

By:	7:/s/				
-	Nader Mobargha, Esq.				

641 Lexington Avenue, 14th Floor New York, New York 10022 Telephone: (646) 755-3603 Facsimile: (646) 755-5229

Email: nmobargha@blmllp.com

Attorneys for Secured Creditor Azadeh Azari